

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JOSEPH BUSHRA,

Plaintiff

v.

MAIN LINE HEALTH, INC.

Defendant

CIVIL ACTION

No. 2:23-cv-01090-HB

**DEFENDANT’S INDEX OF EXHIBITS
IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

Exhibit	Description
A	Transcripts of the deposition testimony of Plaintiff, Joseph Bushra, on July 11, 2023 and October 4, 2023
B	Plaintiff’s EEOC charge filed April 15, 2022
C	Plaintiff’s Employment Agreement with MLEMA, effective January 1, 2015
D	MLEMA Employee Handbook and Dr. Bushra’s signature page
E	Schedule K-1 issued by MLEMA to Dr. Bushra in 2021
F	Dr. Bushra’s Independent Contractor Agreement with Main Line Hospitals
G	Expert Report of Dr. Daniel Salmon
H	MLH COVID-19 Vaccination Policy
I	Email exchange between Plaintiff and Dr. Emma Simpson in September 2021
J	Dr. Bushra’s Request for a Religious Exemption
K	September 22, 2021 email exchange with Dr. Steven Gamburg
L	Transcript of Dr. Jonathan Stallkamp’s deposition
M	October 19, 2021 denial of exemption request
N	Section 4.E.1 of the Medical Staff Bylaws
O	Email exchange with MLH counsel re: leave of absence
P	November 3, 2021 Request for leave of absence
Q	November 15, 2021 Notification of Administrative Suspension
R	December 19, 2022 EEOC Right to Sue Notice

Respectfully submitted,

/s/ Caren Litvin

Caren Litvin, Esq.

(Pa. Atty I.D. No. 41796)

150 N. Radnor Chester Road, Suite F-200

Radnor, PA 19087

CL@litvinlawoffice.com

(610) 977-2049 (office)

Counsel for Defendants

Brendan Hennessy

(Pa. Attorney I.D. No. 91831)

101 Lindenwood Drive, Suite 225

Malvern, PA 19355

bhennessy@hennessylawfirm.com

(484) 875-3111 (office)

*Of Counsel to Litvin Law Office
for Defendants*

Dated: October 17, 2023